

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**LEAD PLAINTIFF'S MOTION TO FILE UNDER SEAL ITS
MEMORANDUM IN SUPPORT OF MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND SUPPORTING AFFIDAVIT**

Pursuant to Local Rule 7.2 and the Stipulated Protective Order Concerning Disclosure of Confidential Information (the “Protective Order”), filed December 26, 2006 (Dkt. No. 178), Lead Plaintiff BPI Global Asset Management LLP (“Lead Plaintiff”) respectfully moves the Court for an Order: (1) permitting Lead Plaintiff to file under seal its Memorandum in Support of Motion to Compel Production of Documents and supporting Affidavit, which will be filed immediately upon notice that this motion is granted; and (2) providing that the Memorandum, Affidavit and attached exhibits shall not be made available for public inspection except by Order of the Court.

Lead Plaintiff intends to file a motion to compel production of specific categories of documents being withheld by defendant Sonus Networks, Inc. (“Sonus”) and third parties who

have been instructed by Sonus to withhold documents pursuant to claims of attorney-client privilege and attorney work product. Contained within the motion will be discussion about the content of documents that have been designated as "CONFIDENTIAL" by Sonus and third parties pursuant to the Protective Order entered on December 26, 2006. These documents will also be attached to an affidavit by counsel for Lead Plaintiff. Pursuant to paragraph 7 of the Protective Order, any party who submits documents designated as "CONFIDENTIAL" must first obtain an Order in accordance with Local Rule 7.2 to file the documents under seal.

WHEREFORE, Lead Plaintiff requests that the Court enter an Order: (1) permitting Lead Plaintiff to file under seal a memorandum in support of motion to compel production of documents, an affidavit by Lead Plaintiff's counsel and attached exhibits; and (2) providing that the memorandum, affidavit and attached exhibits shall not be made available for public inspection except by order of the Court.

Respectfully submitted,

Dated: October 11, 2007

By: /s/ Pamela A. Markert

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CERTIFICATE OF SERVICE

I, Pamela A. Markert, hereby certify that on October 11, 2007, I caused a true copy of the foregoing document to be served electronically via the Court's Electronic Filing System upon all counsel of record.

Dated: October 11, 2007

/s/ Pamela A. Markert